

Application No.: 09/895,768  
Amendment dated: July 22, 2005  
Reply to Office Action dated: April 22, 2005

### **REMARKS/ARGUMENTS**

Claims 1-15, and 19-29 are pending and rejected in the application. Claims 1, 4-7, 15-18, and 19-26 are rejected under 35 U.S.C. §102(b) as being anticipated by Adobe Dynamic Media Group, "A Digital Video Primer," ("Adobe-Dynamic-Media-Group"), pp. 1-31; June 2000. Claims 2, 3, 8-14, and 27-29 are rejected under 35 U.S.C. 103(a) as being unpatentable over Adobe-Dynamic-Media-Group, "A Digital Video Primer," pp. 1-31; June 2000 as applied to claim 1 above, and further in view of Demos U.S. Patent No. 6,442,203.

Claims 1 and 2 have been amended to improve their form.

#### **Claim Rejections Under 35 U.S.C. §102(b)**

Claims 1, 4-7, and 15-26 are rejected under 35 U.S.C. §102(b) as being anticipated by Adobe-Dynamic-Media-Group. Adobe-Dynamic-Media-Group merely provides an overview of various functions that can be performed with desktop software and does not teach the method of applicants' claimed invention. Examiner has attempted to read applicants' claimed invention on Adobe-Dynamic-Media-Group by finding random functions of various software packages that teach various aspects of applicants' claimed invention. Adobe-Dynamic-Media-Group, however, contains no support for piecing any of these various functions into a method for converting animation into interlaced video.

For example, Adobe-Dynamic-Media-Group points out that resizing can be performed with desktop software, but it does not teach resizing as being a step in a method for converting animation to interlaced video. Adobe-Dynamic-Media-Group does not teach resizing frames that have been previously rendered "at a whole number multiple of a digital video resolution value defining the number of pixels contained in each frame and at a whole number multiple of a temporal resolution value defining the rate of display of full frames on a computer screen."

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Adobe-Dynamic-Media-Group's failure to teach a method for converting animation to interlaced video is even more apparent when the functions cited by examiner are looked at in their context. The resizing taught by Adobe-Dynamic-Media-Group is discussed in the context of the trade offs between amounts of data and quality. The function of frame blending, which Examiner claims teaches applicants' blending element is also taught as a means of reducing amounts of data.

Applicants further submit that Adobe-Dynamic-Media-Group in fact teaches away from combining the various functions of these software programs into a method for producing interlaced video. Adobe-Dynamic-Media-Group teaches that resizing and frame blending are compression techniques that reduce amounts of data, but as a result also reduce video image quality. "The goal of compression is to reduce the data rate while still keeping the image quality high." (Adobe-Dynamic-Media-Group, page 7) "Because the video is compressed, it is possible for there to be visible degradations – known as compression artifacts." (Adobe-Dynamic-Media-Group, page 11) Applicants' disclosure teaches resizing and frame blending as part of a method that reduces artifacts. Additionally, when speaking about resizing frames, Adobe-Dynamic-Media-Group states that "[t]hese simple compression schemes won't work, however, if we want our video to be displayed on a television monitor at full resolution and frame-rate. What we need is another way of approaching the compression problem." (Adobe-Dynamic-Media-Group, page 7) Since applicants' claimed invention is a method for converting animation into video with interlaced fields, this explicitly teaches against the applicants' claimed invention.

Further, Adobe-Dynamic-Media-Group teaches:

There are three different frame types in MPEG-2. These are known as I, P, and B frames. I stands for "intraframe" encoding and works just like a DV frame of video. The P frame is a "predicted" frame. It is compounded from the frames previous to it. B is for "bi-directional" frame. This means that not only is the B

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frame computed from previous frames, it can also use frames that come after it. More data must be preserved to describe I frames, making them the "largest," whereas P frames can be less than a tenth of that size. B frames are the smallest. Because the P and B frames are calculated from the I frames, you can't just have one I frame and the rest P's and B's. There must be I frames interspersed or else the accumulated error becomes too great and the image quality suffers.

This does not teach blending consecutive frames that have been resized as recited in claim 1. Adobe-Dynamic-Media-Group makes no mention of the frames being resized before they are converted to I, B, and P frames. Furthermore, neither I, B, nor P frames are blends of "each consecutive frame." An I frame is not blended at all, and a B frame is predicted from frames both before and after it. Adobe-Dynamic-Media-Group states that "P and B frames are calculated from the I frames. . . ." The example provided on page 12 of Adobe-Dynamic-Media-Group only shows 3 of 30 frames being I frames. The IPB format cited by the examiner is therefore not blends of "consecutive frames."

Applicants submit that for at least the above reasons, Adobe-Dynamic-Media-Group does not teach the claimed invention and that claim 1 is allowable. Applicants further submit that claims 4-8 and 15-18 are allowable as depending from claim 1.

**Claim Rejections Under 35 U.S.C. §103(a)**

Claims 2, 3, 8-14, and 27-29 are rejected under 35 U.S.C. §103(a) as being unpatentable over Adobe-Dynamic-Media-Group in further view of Demos. Applicants submit, based on the same reasoning as above, that Adobe-Dynamic-Media-Group does not teach the method of claim 2, and that Demos does not teach the aspects of the applicants' invention that Adobe-Dynamic-Media-Group lacks. Therefore, applicants submit that claim 2 is allowable, and that claims 9-11 are allowable as depending from claim 2.

For all the above reasons, the applicants respectfully submit that this application is in condition for allowance. A Notice of Allowance is earnestly solicited.

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The Examiner is invited to contact the undersigned at (408) 975-7500 to discuss any matter concerning this application.

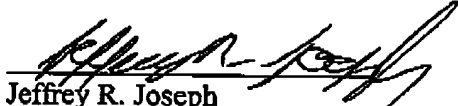
The Office is hereby authorized to charge any additional fees or credit any overpayments under 37 C.F.R. §1.16 or §1.17 to Deposit Account No. 11-0600.

Respectfully submitted,

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